

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. L.B.R. 9004-1

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In Re:

ORBIT ENERGY & POWER, LLC

Debtor.

Case No. 22-19628 (ABA)

Chapter 7

Objection Due: January 9, 2024

Hearing Date: January 16, 2024 @ 10:00 am

**NOTICE OF MOTION OF REPUBLIC BANK  
FOR RELIEF FROM AUTOMATIC STAY TO PERMIT SETOFF**

PLEASE TAKE NOTICE that on January 16, 2024 at 10:00 a.m. (Eastern Time), or as soon thereafter as counsel may be heard, Republic Bank ("Republic"), by and through its undersigned counsel, will move before the Honorable Andrew B. Altenburg, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of New Jersey, Mitchell H. Cohen, U.S. Courthouse, 400 Cooper Street, 4<sup>th</sup> Floor, Courtroom 4B, Camden, New Jersey 08101, for entry of an order, substantially in the form submitted herewith, granting relief from the automatic stay under section 362(d) of title 11 of the United States Code, 11 U.S.C. §§ 101 – 1532 (the "Bankruptcy Code") so that Republic may setoff the Collateral Accounts (defined in the Motion) against its allowed secured claim and waiving the stay imposed by Fed. R. Bankr. P. 4001(a) (the "Motion").

PLEASE TAKE FURTHER NOTICE that in support of the Motion, Republic shall rely upon the Motion submitted concurrently herewith. Republic submits that no separate memorandum of law is necessary because the applicable law is adequately set forth in the supporting Motion.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the entry of an order approving the Motion must be (a) in writing, (b) filed with the Clerk of the United States Bankruptcy Court for the District of New Jersey, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 2<sup>nd</sup> Floor, Camden, New Jersey 08101 on or before January 9, 2024 (the "Objection Deadline"), and (c) served on or before the Objection Deadline on the undersigned counsel for Republic Bank. Service may be made upon the undersigned counsel for Republic Bank by electronic mail at the email address set forth below.

IF NO OBJECTION OR RESPONSE TO THE MOTION IS TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: December 21, 2023

WEIR GREENBLATT PIERCE LLP  
A Pennsylvania Limited Liability Partnership

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